

REMARKS/ARGUMENTS

Reexamination of the captioned application is respectfully requested.

A. SUMMARY OF THIS AMENDMENT

By the current amendment, Applicants basically:

1. Amend all independent claims (see Remarks section C infra)
2. Respectfully traverse all prior art rejections.
3. Apprise the examiner of the filing of an IDS as an additional submission.

B. THE PRIOR ART REJECTIONS

Claims 1-19 and 24-27 stand rejected under 35 USC 103(a) as being unpatentable over U.S. Publication 2001/0034228 to Lehtovirta et al in view of U.S. Patent 6,898,429 to Vialen et al. All prior art rejections are respectfully traversed for at least the following reasons.

C. PATENTABILITY OF THE CLAIMS

All independent claims have been amended to specify that the element is included in the message in lieu of an individual listing of the connections affected by the reset. This amendatory limitation is supported, e.g., by ¶[0054] of applicants' published patent application.

In response to a remark in the final office action, all independent claims have also been amended to specify that the message is the message is an intra-radio access network message by being sent from the node to the at least one another node. Applicants disagree that the independent claims did not previously require that the message be an intra-radio access network message, since it was clear from the previous independent claims that the message was sent from a node of a radio access network to another node

of the radio access network. But with current amendments explicitly include the phrase “intra-radio access network message” to moot the comment of the final office action.

The present amendments provide yet further bases for distinguishing the independent claims over the applied prior art and thus for allowance of all claims. Indeed the present amendments fortify Applicants previous patentability arguments by, e.g., defusing the Examiner responses on pages 2 -3 of the final office action.

All independent claims (1) refer to an intra-radio access network message which is sent from a node of a radio access network to at least one other node of the radio access network with the message (2) including an element which collectively (lieu of an individual listing of the connections affected by the reset) indicates that a subset of the connections are to be released so that the user equipment units involved in the subset can return to an idle mode.

. Applicants contend that the alleged combination of U.S. Publication 2001/0034228 to Lehtovirta et al and U.S. Patent 6,898,429 to Vialen et al. is improper, and even if assumed proper arguendo, do not teach or suggest limitations including those above mentioned.

In particular, all independent claims require a message to a radio access network node with the message comprising an element which collectively indicates that a subset of the connections are to be released, lieu of an individual listing of the connections affected by the reset. Neither Lehtovirta nor Vialen teach or suggest such a collective indication. Contrary to the intimations of the final office action, Lehtovirta ¶[0043] does not teach or suggest an “in lieu of listing” but instead indicates a listing of what connections are affected by the failure. The fact that other connections are not affected

by the partial failure means only that the unaffected connections were not enumerated, whereas the affected connections were individually enumerated.

Lehtovirta's concern is that upon failure only affected connections (e.g., affected radio access bearers) be released (see, e.g., Lehtovirta ¶[0020]). In the Lehtovirta release messages sent within a radio access network, each connection (radio access bearer) which is to be released is listed separately. See, e.g., Lehtovirta ¶¶[0044] - [0046], [0049]. In one embodiment Lehtovirta uses an IP address of a failed device, but the IP address is included in a message which is sent from a core network node to a radio access network node and thus not between nodes of a radio access network (see, e.g., Lehtovirta ¶[0047] *et seq*). As is commonly understood, a core network node is not a radio access network node. Thus, Lehtovirta fails to teach or suggest an intra-radio access network message comprising an element which collectively indicates that a subset of connections are to be released. Lehtovirta does not refer in an intra-radio access network context to a subset of connections nor does Lehtovirta have a collective indicator for such a subset.

Dependent claims 3, 13, and 16 refer, e.g., to plural processes performed by the same node which prepares the release message, and when the reset procedure affects a specific one of the plural processes, an element corresponding to the respective one of the plural subsets of connections handled by the specific one of the plural processes being included in the message. Thus, these claims require that the reset-affected process(es) reside at a node of a radio access network. Figs. 4 – 8 of U.S. Publication 2001/0034228 to Lehtovirta et al all show failure of processes at a core network node, not a radio access network node.

U.S. Patent 6,898,429 to Vialen et al., apparently applied for other reasons, does not cure the above-noted deficiency of U.S. Publication 2001/0034228 to Lehtovirta et al. Vialen is directed to paging of an individual user equipment unit, which is an entirely

procedure than releasing a connection. Paging is typically handled uniquely or individually per user equipment unit, and thus is not ordinarily susceptible to group handling in the manner proposed by Applicants. Please note particularly in this regard that an objective of Vialen's CRNC is to assign a unique c-RNTI to a user equipment unit on an individual or per UE basis. For that among other reasons Vialen is not combineable with U.S. Publication 2001/0034228 to Lehtovirta et al for the purposes attempted in the office action.

Dependent claims 4, 6, and 10 all require, e.g., that the element comprise a group identity for the subset of connections; wherein the group identity comprises a group value and a group bit mask index, wherein the group bit mask index indicates bits of the group value which are common for all connections of the subset of connections; and wherein the group value is a group S-RNTI and the group bit mask index indicates the bits of the group S-RNTI which are common for all connections of the subset of connections. In rejecting these claims the office action basically refers to the Lehtovirta list of UE identifiers and to the s-RNTI of Vialen col. 2, lines 42 – 56. The Lehtovirta list is not only not a collective indication, but (since it is merely a list of individual radio access bearers) lacks the claimed group value and group bit mask index. Similarly, by definition the Vialen s-RNTI is associated with one and only user equipment unit, is sent in a message that concerns only one user equipment unit, and thus also lacks the claimed group value and group bit mask index.

D. MISCELLANEOUS

In view of the foregoing and other considerations, all claims are deemed in condition for allowance. A formal indication of allowability is earnestly solicited.

The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for entry of these papers and the continued pendency of the captioned application.

Should the Examiner feel that an interview with the undersigned would facilitate allowance of this application, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,
NIXON & VANDERHYE P.C.

By: /H. Warren Burnam, Jr./
H. Warren Burnam, Jr.
Reg. No. 29,366

HWB:lsh
901 North Glebe Road, 11th Floor
Arlington, VA 22203-1808
Telephone: (703) 816-4000
Facsimile: (703) 816-4100

Attachments: Information Disclosure
Statement (IDS)